



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Chief Counsel  
Ethics Office, AGC-90

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Washington, D.C. 20591

## **Ethics Policy Statement on Teaching AT-CTI Curriculum**

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**No FAA employee may teach AT-CTI curriculum at an FAA AT-CTI approved school/university.<sup>1</sup>**

This policy also applies to non-approved AT-CTI programs at schools/universities that have entered into an arrangement/agreement with a school/university that has an approved AT-CTI program for the purposes of student recognition under that program to the FAA.<sup>2</sup>

Except for the above, this policy does not apply to teaching at AT-CTI approved schools/universities in other disciplines or teaching at non-AT-CTI approved schools/universities. To avoid confusion, all employees seeking to teach at an AT-CTI approved schools/university should seek approval from their Ethics official prior to accepting the outside position. For consistency, Ethics officials should consult with AGC-90 prior to making a determination on what is or is not approved AT-CTI curriculum.

### **Background on AT-CTI Programs**

As of 2011, the FAA has approved 23 Colleges/Universities to participate in its Air Traffic Collegiate Training Initiative Program (AT-CTI Program). Colleges/Universities selected to offer an AT-CTI Program serve as potential sources of candidates for ATCS positions within the FAA. Because the AT-CTI curriculum provides appropriate education, experience, and training which meet the basic requirements for the terminal and En route air traffic occupations, AT-CTI graduates are frequently permitted to bypass some of the basic courses taught as part of the FAA Academy's ATC training program.

It is important to note that the agency's approval of an AT-CTI school goes far beyond recognition that the school offers course work acceptable under the agency's requirements. It establishes a formal business relationship between each AT-CTI school and the agency. The Office of Acquisition & Business Services within the Air Traffic Organization (ATO) serves as the Program Manager and liaison between the schools and the FAA. As program manager, ATO evaluates the organizational foundation and resources, organization credibility, curriculum and facilities, and the teaching faculty of each school prior to approval. It develops and manages issues and policies relating to the qualifications, recruitment, and employment of AT-CTI graduates. ATO also funds the administration of the AT-SAT test, an agency required computer-based entrance exam for Air Traffic Controller occupation in the terminal and En route options.

For more Info on the Agency's Role: See HROI - Air Traffic-Collegiate Training Initiative (AT-CTI)

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<sup>1</sup> The term "teach" includes but is not limited to serving as adjunct professor, professor, lab instructor, advisor, or Board/Committee/Council member for an AT-CTI Program.

<sup>2</sup> Paragraph added March 2015.

**Standard Operating Procedures:**

[https://employees.faa.gov/org/staffoffices/ahr/program\\_policies/policy\\_guidance/hr\\_policies/hrpm/hroi/emp/atctisop/](https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/hr_policies/hrpm/hroi/emp/atctisop/)

**List of current AT-CTI Approved Schools/Universities -**

<https://employees.faa.gov/org/linebusiness/ato/news/spotlight/story/index.cfm?newsId=53371>

**Application of Ethic Rules:**

Under the ethics rules, employees are prohibited from engaging in outside employment or outside activity that conflicts with their official duties or creates the appearance of violating any of the ethical standard including but not limited to the prohibition against use of official position for private gain or the private gain of another with whom the employee has employment or business relations or is otherwise affiliated in a nongovernmental capacity. 5 CFR 2635.101(b)(10); 2635.801(c)-802. FAA's AT-CTI is a nationwide program and as a federal agency, we are the safe-keepers of the public trust and must retain our impartiality and guard against the public perception that we are misusing our authority or granting preferential treatment in connection with the operation of agency sponsored programs. 5 CFR 2635.101(b)(8). That being said, our involvement with AT-CTI schools creates an official business relationship that we cannot allow to be used by employees as a vehicle for FAA employees to obtain a personal benefit outside of their government jobs. Likewise, we also cannot allow AT-CTI schools to create the appearance that the agency favors one school over another, especially not because a school has FAA employees on its payroll.

**Note:** 5 CFR 2635.807(a)(3), which creates an exception for acceptance of compensation by the employee for teaching an established curriculum at an institution of higher education, does not apply to the above outside employment, teaching situation. Section 2635.807(a)(3) only exists to permit the receipt of compensation by the employee for an otherwise permissible outside activity, which based on my determination is not the situation presented.